

UNITED STATES DISTRICT COURT
DISTRICT OF NEBRASKA

JUSTIN RIDDLE,

Plaintiff,

v.

Case No. 8:24-cv-00431

OMAHA PUBLIC SCHOOLS,

Defendant.

PLAINTIFF'S CONSOLIDATED MOTION EXPOSING JURISDICTIONAL DEFICIENCY,
JUDICIAL MANIPULATION, AND DEMANDING IMMEDIATE REMAND

COMES NOW the Plaintiff, Justin Riddle, and respectfully submits this consolidated memorandum demonstrating not only the court's clear lack of jurisdictional basis for continued proceedings, but also the transparent and desperate attempt to manufacture procedural obstacles and delay justice.

I. ABSENCE OF FEDERAL JURISDICTION

This Court's retention of the case is legally unsupportable:

A. No Federal Question (28 U.S.C. § 1331)

- All federal claims voluntarily dismissed in Amended Complaint
- No federal constitutional or statutory issues remain
- Federal question jurisdiction definitively extinguished

B. No Diversity of Citizenship (28 U.S.C. § 1332)

- Both parties are Nebraska citizens
- Complete diversity plainly absent
- No amount in controversy to invoke jurisdiction

II. MANDATORY REMAND UNDER 28 U.S.C. § 1447(c)

The Court is statutorily compelled to remand when:

- All federal jurisdictional grounds have vanished
- No legitimate federal interest remains
- State law claims exclusively control the dispute

III. DEFENDANTS' PROCEDURAL FORFEITURE

Defendants have waived procedural objections by:

- Removing to federal court on merits arguments
- Failing to assert technical defenses in removal
- Committing to substantive arguments on dismissal
- Trapping themselves in their chosen federal forum

IV. IMPROPER DELAY AND MANIPULATION

The Court's "normal briefing schedule" is a transparent attempt to:

- Unnecessarily prolong plainly improper federal proceedings
- Tactically force Plaintiff into voluntary dismissal
- Allow Defendants to escape their procedural waivers
- Reset the litigation in state court to regain technical defenses
- Manufacture a dismissal to avoid substantive reckoning

V. PREJUDICE AND MISCONDUCT

This manipulative delay tactic:

- Wastes limited judicial resources on artificial briefing
- Prejudices Plaintiff's right to prompt adjudication
- Violates core procedural due process principles
- Approaches the threshold of sanctionable misconduct

VI. PATTERN OF INSTITUTIONAL PROTECTION

The instant acceptance of a baseless removal, contrasted with sudden delay in the face of obvious remand, mirrors the Court's previous:

- Disregard of clear jurisdictional defects in service of delay
- Dismissal timed to strategically preempt evidence of ongoing harm
- Appearance of coordinated institutional defense and obfuscation

This pattern exposes a systemic failure to neutrally apply the law.

VII. FUTILITY OF GAMESMANSHIP

Plaintiff serves notice that maneuvering to engineer a voluntary dismissal will not reset the playing field or obviate the public record of:

- Every step of this transparent manipulation
- Every tactic of institutional protection
- Every attempt at procedural gamesmanship
- Every revelation of judicial bias and abdication

Justice will not tire. The truth will not relent. The sheer magnitude and scale behind these obvious efforts to avoid the obvious cannot be understated. The level of coordination, effort, and clever obfuscation and wordsmithing needed to avoid

confronting such a plain and obvious lie could not be implemented by an individual nor by unsophisticated individuals. This takes precise, laser focused strategy.

To point out a comparable absurdity, here's an analogy that captures a similar idea:

Imagine a person who is lost in a dense forest and is desperately trying to find their way out. They have a clear map that shows the direct path to safety, but every time they attempt to follow it, the forest seems to shift and change around them.

They try to point out the obvious route indicated on the map to the forest rangers, but the rangers keep dismissing their pleas, stating that the map is not drawn to scale or that the color scheme is wrong. The lost person keeps presenting the map, year after year, but the rangers consistently find new and increasingly absurd reasons to disregard it.

The rangers insist that the person follow a complex set of rules and rituals to navigate the forest, which have nothing to do with the actual way out. They demand that the person tie their shoelaces in a specific way, walk backward for a certain number of steps, or sing a particular song before they can even consider looking at the map.

As the years go by, the lost person becomes more and more frustrated and discouraged. They can see the clear path to safety right in front of them, but the

rangers' refusal to acknowledge it makes it impossible to move forward. The forest seems to grow more dense and tangled around them, mirroring the bureaucratic labyrinth they are trapped in.

For the rangers to continue to ignore the map for so many years would require a level of willful blindness that borders on the absurd. It's as if they are deliberately trying not to see the obvious truth, no matter how clearly it is presented to them. The lost person is left to wonder if they will ever be able to find their way out of the forest, or if they are doomed to wander in circles forever, haunted by the map that could save them if only someone would look at it, while the rangers have vehicles with GPS and could simply drive the person 2 miles back where their car was towed years earlier, and they could move on with their life.

This analogy echoes the same themes as Plaintiff's court system scenario - the idea of a clear and obvious truth being repeatedly ignored or dismissed on arbitrary grounds, the unfairness of a system that seems designed to keep people trapped and confused, and the mounting frustration and despair of someone who can see the solution to their problem but is powerless to convince those who are there to help acknowledge it. The level of sheer effort it takes to continue to find novel ways to avoid the glaring obvious lie presented to the court followed by the lies stated to the court from the defense, truly proves without a question that the system is only for the privileged, everyone else need not apply.

The simple fact that cannot be overstated is that at this point, the Supreme Court of Nebraska, the Attorney General, the ombudsman, three different State Court judges, two federal judges, the 8th circuit, the school district, multiple attorneys, and every single one of the staff of each and every person involved, has officially had in their hands on an uncontested lie published by the Attorney General that the AG was willing to trespass the plaintiff rather than correct. WHAT AGAIN ARE WE BRIEFING IN FEDERAL COURT FOR, IF NOT TO WASTE TIME, TAXPAYER MONEY AND IGNORE THE FACTS? THERE'S LITERALLY NO JURISDICTION.

VIII. REQUEST FOR RELIEF

Plaintiff respectfully demands the Court:

1. Immediately remand this case to Douglas County District Court
2. Terminate all dilatory and unjustified federal proceedings
3. Issue an order confirming the patent lack of federal jurisdiction
4. Cease compounding the prejudice of groundless procedural delay
5. Respect the law and quit ignoring flat lies from Government officials and

Stewards of the Court, as never a situation so clearly documented has been shown on Netflix.

Respectfully submitted,

Justin Riddle, Pro Se Plaintiff and Citizen Demanding Accountability

I certify under penalty of perjury that every single word contained in this document is true to the best of my knowledge and belief.